

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This filing relates to the Dealership
Class Action

MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant The Reynolds & Reynolds Company's Memorandum in Support of its (1) Motion to Dismiss the Reynolds Dealer Plaintiffs' Claims in Favor of Arbitration and Stay Remaining Claims and (2) Motion to Dismiss the Consolidated Class Action Complaint Pursuant to Rule 12(b)(6) and its accompanying exhibits contain information that has been designated "confidential" and "highly confidential" under the Agreed Confidentiality Order (Dkt. 104). The information so designated by Reynolds is confidential business information and contract language. Therefore, Reynolds cannot file the Memorandum and exhibits in the public docket. Reynolds respectfully requests that this Court enter an order permitting Reynolds to file the Memorandum and exhibits under seal.

Dated: July 18, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Aundrea K. Gulley, an attorney, hereby certify that on this 18th day of July, 2018, I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Aundrea K. Gulley

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